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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Larry Morgan

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MUR 4818

SENSITIVE

GENERAL COUNSEL'S REPORT #13

I. ACTIONS RECOMMENDED

Accept the attached conciliation agreement.

II. BACKGROUND

MUR 4818 arose from a complaint alleging that Walt Roberts and Walt Roberts for Congress ("the Committee") knowingly and willfully violated 2 U.S.C. § 441a(f). Through the Commission's investigation, we discovered that Gene Stipe was at the center of multiple schemes that transferred funds from Stipe into the Committee, while hiding Stipe as the true source of the contributions. One scheme included recruiting intermediaries, such as Larry Morgan, to whom Stipe, with the help of Michael Mass, gave at least fifteen thousand dollars. Morgan then funneled Stipe's money to straw contributors so as to make the contributions appear as if they were legitimate. Michael Mass has already signed a conciliation agreement and paid a civil penalty approved by the Commission.

On October 9, 2003, the Commission found reason to believe that Larry Morgan knowingly and willfully violated 2 U.S.C. § 441f by assisting Stipe in the making of excessive contributions in the names of others and entered pre-probable cause conciliation.

CONCILIATION INFORMATION IS CONTAINED IN PAGE 2.
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255-604-403-1392

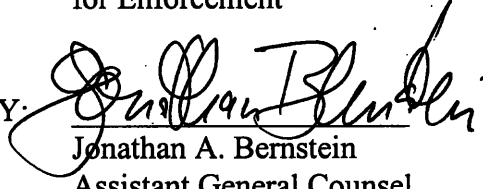
IV. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Larry Morgan.
2. Close the file as to Larry Morgan.
3. Approve the appropriate letter.

Lawrence H. Norton
General Counsel

Rhonda J. Vosdingh
Associate General Counsel
for Enforcement

BY:


Jonathan A. Bernstein
Assistant General Counsel


Margaret J. Toalson
Attorney


Daniel G. Pinegar
Attorney

Attachment:

1. Ltr. (12/16/2003): Conciliation Agreement and Check